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To: Mattress EPR
Subject: Comments on Proposed Regulatory Text

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The following are three comments on the regulatory text for the Proposed Regulations for the Used Mattress Recovery and Recycling Program:

1) Replace the word "may" with "SHALL**" in Section 18962, (a) (8) to read as follows:**

Advisory Committee Report. Include the report by the mattress recycling organization advisory committee as required by subdivision (q) of section 42987.1 of the Public Resources Code. The mattress recycling organization **SHALL** include a description of how it addressed the points or recommendations 3 raised in the Advisory Committee Report.

2) Replace the word "recycler" with the word "RENOVATOR**" in Section 18966, (a) to read as follows:**

(a) An annual report shall be submitted to the department and the mattress recycling organization by a person that is engaged in business as a used mattress renovator. The annual report may be submitted electronically according to instructions provided by the department. A hard copy, signed by a corporate officer of a mattress **RENOVATOR** shall be submitted to the department upon request.

3) Add the following words in Section 18967, (a) to read as follows:

(a) An annual report shall be submitted by a person that is engaged in business as an operator of a solid waste facility **that elects to separate out mattress materials for recycling** to the department and the mattress recycling organization. The annual report may be submitted electronically according to instructions provided by the department. A hard copy, signed by a designated representative of a solid waste facility shall be submitted to the department upon request.

Let me know if you have any questions regarding our comments. Thank you.

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